

CH2MHILL

May 20, 2002

CH2M HILL
2485 Natomas Park Drive
Suite 600
Sacramento, CA
95833-2937
Tel 916.920.0300
Fax 916.920.8463

Ms. Kristy Chew
Siting Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

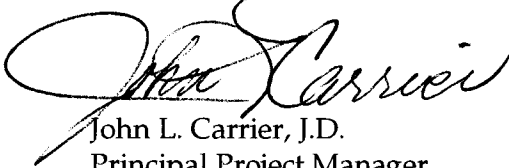
RE: Data Responses from Peasha, Set 1
Cosumnes Power Plant (01-AFC-19)

On behalf of the Sacramento Municipal Utility District, please find attached 12 copies and one original of the Data Responses, Peasha, Set 1, in response to Ms. Kathy Peasha's data request of April 30, 2002.

Please call me if you have any questions.

Sincerely,

CH2M HILL



John L. Carrier, J.D.
Principal Project Manager

c: Colin Taylor/SMUD
Kevin Hudson/SMUD
Steve Cohn/SMUD

COSUMNES POWER PLANT (01-AFC-19)

DATA RESPONSE, KATHY PEASHA SET 1

Submitted by
**SACRAMENTO MUNICIPAL
UTILITY DISTRICT (SMUD)**

May 20, 2002



2485 Natomas Park Drive, Suite 600
Sacramento, California 95833-2937

Technical Area: Project Description

CPP Authors: Kevin Hudson and John Carrier

BACKGROUND

REF: Applicant's Supplement B 1.2-Construction Access Road

The Herald Community rejects the use of Clay East Road by Cosumnes Power Project (CPP) to handle CPP's construction traffic or for use as an access road for CPP's operation and maintenance. Please provide documentation of the following requests

DATA REQUEST

PD-1. Any attempts by applicant for alternate routing of construction and operation and maintenance traffic confined to SMUD's property.

Response: SMUD learned from area residents that Clay East Road was not a desired construction route for CPP. There are potential safety concerns co-mingling construction traffic with residential traffic, school buses, and student pedestrians. SMUD studied alternative traffic patterns and roadway modifications, considered adjusting the hours of construction, and considered performing shift work to avoid conflicts with community traffic. SMUD also met with the Galt and Arcohe School District transportation staff to review bus routes and discuss alternative student transportation measures. As a result of its studies, SMUD felt the alternative that would best meet the concerns of the local residents was to construct an alternate roadway that would avoid the entire area of concern. Although constructing a new roadway would be more costly than some of the other alternatives that were considered such as upgrading existing roadways or altering bus transportation routes, it appears to be the best measure to minimize overall community impacts. This proposal and the environmental documentation for this alternative was submitted to the CEC on April 15, 2002 as AFC Supplement B. The proposed alternate construction access road is located on SMUD property and starts at the Rancho Seco Park access road and extends southward to the east end of Clay East Road. This is the most direct alternative route for CPP construction traffic and it avoids the west end of Clay East Road (i.e., the residential area) that was a concern for area residents.

PD-2. Any known restrictions or regulations that may be associated with routing all construction, operation and maintenance traffic per map which is not to scale (See Attachment 1.0)

Response: SMUD's proposed route is marked on AFC Supplement B Figure 1-8. This figure was renamed Attachment 1.0 in the data request and depicts another

COSUMNES POWER PLANT (01-AFC-19)
DATA RESPONSES, KATHY PEASHA, SET 1

route drawn by the requestor to the north and west of the Rancho Seco Plant (RSP) industrial area. SMUD has a number of observations regarding this route.

The requestor's proposed route is approximately twice the length of SMUD's proposed alternative route and goes through grassland that is generally undisturbed. The Applicant chose its shorter and more direct route since it follows a bladed dirt path and limits impact to annual grassland.

The requestor's proposed route crosses a railroad spur. CPP plans to use this spur for heavy haul loads to keep most large shipments off public roadways. Since the spur will be used during construction, this introduces a safety issue. A crossing arm set would probably be required to ensure worker safety even though the spur is not often used.

The requestor's proposed route provides a paved roadway within 50 feet of the barrier fence and within 400 feet RSP's Independent Spent Fuel Storage Installation (ISFSI). Due to the geographical contours of the land, the proposed route would also overlook the ISFSI. Construction of a paved roadway outside of a barrier fence and overlooking the ISFSI is inconsistent with best practices, and would be inconsistent with RSP's safety plan.

The requestor's proposed route crosses ephemeral drainages and a riparian corridor supported by two creeks, including the unnamed outfall from RSP and Clay Creek. SMUD's proposed route crosses three small drainages and has a lower impact to the environment, and is more easily mitigated, since it avoids riparian areas and creeks.

The requestor's proposed route connects to an existing paved road that was used during RSP construction. A portion of the roadway conflicts with the CPP plant site footprint and electrical switchyard, so it would not be suitable for everyday construction traffic unless another roadway was constructed to the west of the existing PG&E Bellota transmission lines. This would disturb additional annual grassland. For the same reason, the requestor's proposed route would not be suitable for operation and maintenance, or for Phase 2 construction.

PD-A Any known restrictions or regulations that may be associated with locating proposed lay down area on the north side of Clay East Road. Note: Location of proposed lay down area as shown in Supplement B Figure 1-8 relates to the Herald Community's request to relocate proposed construction and operation and maintenance access as shown in Supplement B Figure 1-8.

Response: The proposed construction laydown area is located immediately south of the CPP plant site across Clay East Road. A suitably sized laydown area

on the north side of Clay East Road and to the east of the plant site would impact protected wetlands areas and the southern fork of Clay Creek. This location would also impact mine tailings to the east, which are determined to be a cultural feature and their disturbance may release hazardous materials used during mining operations. A laydown area north of Clay East Road and to the west of the CPP plant site would also impact protected wetlands. SMUD's AFC filing shows a small laydown area at this location, but SMUD has not pursued this option as it became clear that the single, larger laydown area on the south side of Clay East Road would have fewer and mitigable environmental impacts.

It should be noted that with the new construction access road described in Supplement B, locating the construction laydown area on the south side of Clay East Road will not affect traffic in the residential area of Clay East Road.

PD-3. Provide SMUD's proposal to restrict access and egress to the CPP site on Clay East Road from the west.

Response: Construction workers and construction material delivery trucks would be directed to use SMUD's proposed alternative construction traffic route. Employees and contractors would be required to comply with the required traffic pattern. Instruction on the correct traffic protocol would be a part of mandatory environmental and safety training for all employees and contractors and will be the required access route in the contracts let to the construction contractors. If workers do not follow the prescribed route, they will be subject to dismissal from this project.

Of course, there may still be a need to do some initial construction activities using Clay East Road until the project receives final approvals from all state and federal agencies and the road can be constructed. Also, there may be special circumstances that require the use of Clay East Road. For example, there may be a need to use Clay East Road for emergencies, or for shipment of materials where alternative routes would present logistical or safety risks. Under all but emergency circumstances, SMUD would coordinate use with the community and avoid times when school children are getting on or off of school busses, or use other safety precautions to protect children.

PD-4. Provide SMUD's proposed mitigation measures to address the Herald Communities traffic safety concerns if CPP's operations and maintenance traffic utilizing Clay East Road off of Twin Cities Road is being considered.

Response: As presented in AFC Table 8.8-14, approximately 20 personnel would be committed to operate the plant. During normal operation, 15 operations personnel would be on site during the daytime shift. The traffic analysis

COSUMNES POWER PLANT (01-AFC-19)
DATA RESPONSES, KATHY PEASHA, SET 1

indicates that this small increase in vehicle traffic would not present a significant contribution to traffic on Clay East Road; therefore, no mitigation measures are proposed. A summary of expected truck and delivery traffic was reported in Data Response #180 on February 4, 2002 (Data Response Set 2A). Most deliveries would typically occur during non-commute, daytime hours and periods when Clay East Road has little traffic.

SMUD met with the Herald Fire District to clarify traffic counts, discuss traffic and transportation, and review the hazardous materials anticipated on-site. The Herald Fire District did not express concerns about traffic at the time of the meeting, or in the 2 months since the meeting took place.

SMUD has held discussions with Sacramento County Department of Transportation personnel to look at ways to make the Clay East Road and Twin Cities Road safer, perhaps by forming a tee intersection. This intersection is being studied by the County independent of CPP, and the Applicant has offered to work with the County to ensure its natural gas pipeline would be located in a manner that would not inhibit future improvements to this intersection.

Technical Area: Noise
CPP Authors: Mark Bastasch

BACKGROUND

Reviewing SMUD's AFC data regarding existing ambient noise survey AFC 8.5, I notice two things: (1) existing reported survey noise levels appear high, and (2) the dates on which the surveys were taken coincided with approximate dates of seasonal night time agricultural work. Seasonal nighttime agricultural work would alter normal existing night and daytime ambient noise levels.

DATA REQUEST

NO-1. Please provide additional noise surveys at my residence with my knowledge of when actual survey will be conducted. My residence is referred to in AFC 8.5 as R-2 (5,100 feet) 11615 Kirkwood Street.

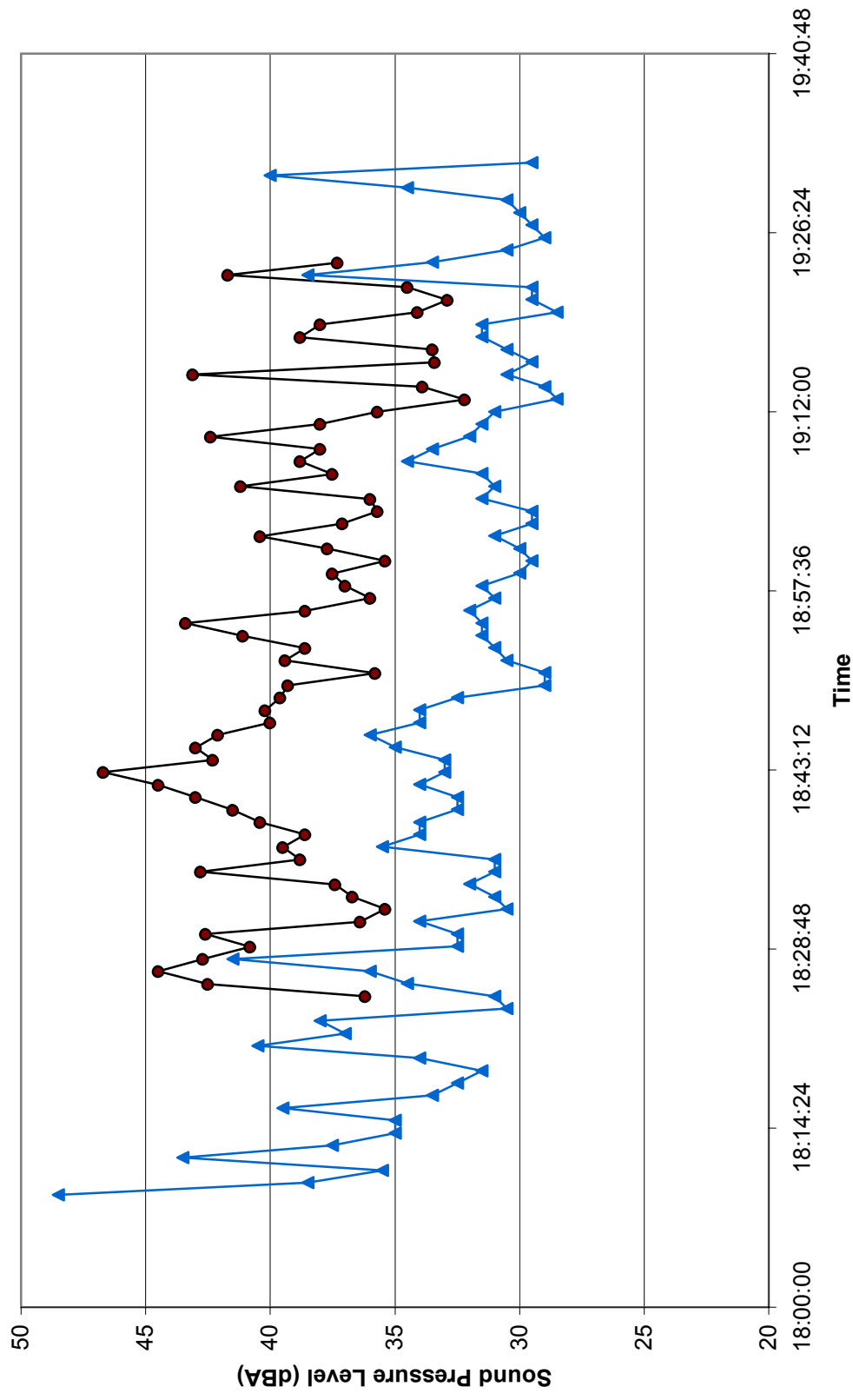
Response: Based on your verbal request, additional monitoring was conducted during the evening hours of April 3, 2002, when one would expect nighttime activities would be taking place. Measurements were taken concurrently at M1 (location used in the AFC) and on the opposite side of Kirkwood Street from your home (11615 Kirkwood Street). The results are presented in Figure NO-1 attached. The L90 noise levels measured at your home consistently exceeded those recorded at the site.

The CEC had a similar concern. CEC Data Request #65 states: "... please address the question of whether the noise level data collected at site M1 reasonably represent the noise exposure at the residences affected." The results of Figure NO-1 clearly show that the ambient noise monitoring performed at M1 is conservative in that the L90 at Kirkwood (i.e., the area of the affected residences) is consistently higher than the L90 at M1.

NO-2. Every effort should be made to ensure that the additional noise survey is not done at a time when adjacent vineyard operators are carrying out their unusual and/or seasonal nighttime operations.

Response: No agricultural activities were observed during the monitoring period.

Figure NO-1
L90 Noise Levels at CPP Site (1) and Residence on Kirkwood (2)
April 3, 2002



Technical Area: Visual Resources

CPP Authors: Wendy Haydon

BACKGROUND

Staff's Data Requests Set 1A-Request 102
Applicant's Data Response 102 Figure 8.11-3C
KOP 2

As resident and property owner of KOP 2, I have never witnessed the amount of glow emitted from the existing Ranch Seco Power Plant nor the existence of background lights judged to be from the Martel/Jackson area as depicted in Applicant's data response Figure 8.11-3-C (an 11 x 17 copy of photograph). I have observed that Applicant has arranged for additional photographs.

DATA REQUEST

VR-1. Please provide intervenor with copies of all photographs (first and second photo sessions).

Response: The KOP 1 and 2 photos from the first nighttime photo session taken January 1, 2002 (Figure 8.11-3c) are attached. They were included in the AFC. In addition, the photos from the second nighttime photo session taken April 3, 2002 (Figures 8.11-2d, 8.11-3d, and the underexposed and overexposed photos of KOPs 1 and 2 taken that night) are also attached to this Data Response. The CEC staff may want to replace the photos submitted in the AFC (Figures 8.11-2C and 8.11-3c) with Figures 8.11-2d and 8.11-3d, that are more representative of nighttime conditions.

VR-2. Please provide information in equipment and settings used in figure 8.11-3C and more recent photographs of night and background light.

Response: The photo in Figure 8.11-3c was taken in the evening on January 1, 2002, using a Canon Rebel 2000, 35-mm single lens reflex camera, using a 50 mm lens. It was mounted on a Velbon tripod Model DF-60 at approximately 5.5 feet above ground level. A Canon RS-60E3 remote switch was used.

The camera was set on "P" (Program AE) in which the camera automatically sets the shutter speed and aperture to suit the brightness of the subject. In addition, the camera was set on manual focus. A flash was not used, and 800 speed film was used.

COSUMNES POWER PLANT (01-AFC-19)
DATA RESPONSES, KATHY PEASHA, SET 1

The temperature was relatively low, and humidity was high (it had just rained). It is expected that the Rancho Seco Power Plant appeared more lit in the photo (Figure 8.11-3c) than what was seen at night due to the high humidity.

Nighttime photos were also taken from KOPs 1 and 2 on April 3, 2002, using the same camera, tripod, remote switch, and type of film. Again, a flash was not used. The camera was set to "AV" (aperture-Priority AE/Depth of Field Preview) in which the aperture was set manually and the camera automatically sets the shutter speed to suit the brightness of the scene.

Figures 8.11-2d and 8.11-3d show the nighttime views of KOPs 1 and 2, respectively, as seen on April 3, 2002, when the humidity was lower than that experienced in January 2002. These two photos are considered the exposures that are most similar to what is actually seen at night.

Also attached are underexposed and overexposed photos of the views from KOPs 1 and 2, also taken on April 3, 2002 (one underexposed photo from each KOP and one overexposed photo from each KOP for a total of four photos). The table below shows the camera settings used for each of the six photos taken on April 3, 2002.

TABLE VR2-1
Camera Settings for Nighttime Photos of Rancho Seco Power Plant Taken on April 3, 2002

Graphic	Negative Number	Shutter Speed (seconds)	Aperture
KOP 1—Trailer Near CPP Site			
KOP 1 Underexposed photo	23A	1/4	f ₈
Figure 8.11-2d KOP 1 (Middle Exposure)	24A	1/3	f ₈
KOP 1 Overexposed photo	22A	4	f ₈
KOP 2—Kirkwood and Clay East Roads			
KOP 2 Underexposed photo	1A	1/15	f ₈
Figure 8.11-3d KOP 2 (Middle Exposure)	13A	1/20	f ₈
KOP 2 Overexposed photo	8A	30	f ₈



FIGURE 8.11-2c
KOP 1: NIGHTTIME VIEW OF PROJECT SITE
COSUMNES POWER PLANT
APPLICATION FOR CERTIFICATION



Cosumnes PP E012002002SAC KOP 2 (night)

FIGURE 8.11-3c
KOP 2: NIGHTTIME VIEW OF PROJECT SITE
COSUMNES POWER PLANT
APPLICATION FOR CERTIFICATION

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KOP 1: UNDEREXPOSED NIGHTTIME VIEW OF PROJECT SITE
COSUMNES POWER PLANT
APPLICATION FOR CERTIFICATION



Cosumnes PP E042002006SAC KOP_1_middle.fh10 5-16-2002 dash

FIGURE 8.11-2d
KOP 1: NIGHTTIME VIEW OF PROJECT SITE
COSUMNES POWER PLANT
APPLICATION FOR CERTIFICATION



KOP 1: OVEREXPOSED NIGHTTIME VIEW OF PROJECT SITE
COSUMNES POWER PLANT
APPLICATION FOR CERTIFICATION



KOP 2: UNDEREXPOSED NIGHTTIME VIEW OF PROJECT SITE
COSUMNES POWER PLANT
APPLICATION FOR CERTIFICATION



FIGURE8.11-3d
KOP 2: NIGHTTIME VIEW OF PROJECT SITE
COSUMNES POWER PLANT
APPLICATION FOR CERTIFICATION



KOP 2: OVEREXPOSED NIGHTTIME VIEW OF PROJECT SITE
COSUMNES POWER PLANT
APPLICATION FOR CERTIFICATION